

## REMARKS

Claims 1-12 are pending. Claims 1, 6 and 10 are amended herein. No new matter is added as a result of the claim amendments.

### 103(a) Rejections

#### Claims 1, 4-7 and 9-12

Claims 1, 4-7 and 9-12 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Nevarez et al. ("Nevarez;" US 6,189,103) in view of Saliba et al. ("Saliba;" US 6,052,710) and further in view of Narasimhan et al. ("Narasimhan;" US 6,446,192) and Shaw et al. ("Shaw;" US 5,867,712). The Applicant has reviewed the cited references and respectfully submits that the present invention as recited in Claims 1, 4-7 and 9-12 is not anticipated nor rendered obvious by Nevarez, Saliba, Narasimhan and Shaw, alone or in combination.

First, Applicant respectfully notes that four references are cited against Claims 1, 4-7 and 9-12. The fact that a large number of references must be combined in an attempt to meet the claimed invention is evidence of nonobviousness.

Also, Applicant respectfully notes that the instant Office Action admits that, even though a large number of references are cited, the combination of references still do not teach all of the claimed features. The fact that a large number of references must be combined, but still do not meet the claimed invention, is further evidence of nonobviousness.

With regard to independent Claims 1, 6 and 10, Applicant respectfully agrees with the statement in the instant Office Action that neither Nevarez nor Saliba teach compiling a web server by selecting

classes required to form the web server on a device. However, Applicant respectfully disagrees with the statement that this limitation is taught by Narasimhan.

The instant Office Action states that Narasimhan teaches "forming a customized applet that is installed on a web server chip and provides the server chip with web server functionalities by allowing the chip to interface with a client." Applicant respectfully submits that, in fact, Narasimhan does not teach that which is relied upon. The Java applet formed according to Narasimhan only provides the user of the client with the capability to remotely monitor and/or control remote equipment. The applet is programmed into the memory of a network interface chip (the chip may be a server). However, the applet does not provide the network interface chip with web server functionality. To reiterate, the Java applet formed according to Narasimhan only provides the user of the client with the capability to remotely monitor and/or control remote equipment, and there is no showing or suggestion in Narasimhan that the applet provides the server with web functionality.

Furthermore, Narasimhan's applet is not the mechanism that allows the chip to interface with the client. That is, according to Narasimhan, the applet only provides a graphical user interface, which may facilitate the interface between the chip and the client, but is not necessary for the interface. Clearly, the client and the chip can interface without the applet, because the client and the chip must connect in order for the applet to be downloaded to the client.

To summarize, Applicant respectfully submits that Narasimhan does not teach "forming a customized applet that is installed on a web

server chip and provides the server chip with web server functionalities by allowing the chip to interface with a client," because Narasimhan's applet does not provide the chip with web server functionality, nor does Narasimhan's applet allow the chip to interface with the client.

Specifically, the Applicant respectfully submits that Narasimhan, alone or in combination with Nevarez and Saliba, does not show or suggest a method comprising "providing a web server class library and a virtual machine class library, wherein the web server class library and the virtual machine class library include classes for different web applications and for forming different application-specific web servers; ... and ... compiling the web server by selecting, from the web server class library and the virtual machine class library, classes required to run the web application in the device to form the web server, wherein the web server is specific to the web application" as recited in independent Claim 1. Claims 4 and 5 are dependent on Claim 1 and recite additional limitations.

Applicant also respectfully submits that Narasimhan, alone or in combination with Nevarez and Saliba, does not show or suggest "a web server class library and a virtual machine class library, each including classes for different web applications for forming different application-specific web servers; and .. a compiler that ... forms an application-specific web server ... and forms an application-specific virtual machine" as recited in independent Claim 6. Claims 7 and 9 are dependent on Claim 6 and recite additional limitations.

In addition, Applicant respectfully submits that Narasimhan, alone or in combination with Nevarez and Saliba, does not show or

suggest "an application-specific web server and an application-specific virtual machine that together execute the web application on the device, wherein the application-specific web server and the application-specific virtual machine are compiled from a web server class library and a virtual machine class library, wherein the web server class library and the virtual machine class library include classes for different web applications and for forming different application-specific web servers and different application-specific virtual machines" as recited in independent Claim 10. Claims 11 and 12 are dependent on Claim 10 and recite additional limitations.

Furthermore, Applicant respectfully submits that Shaw does not overcome the shortcomings of Narasimhan, Nevarez and Saliba. Applicant respectfully submits that Shaw, alone or in combination with Narasimhan, Nevarez and Saliba, also does not show or suggest the claim limitations recited above.

Therefore, Applicant respectfully submits that the basis for rejecting Claims 1, 6 and 10 under 35 U.S.C. § 103(a) is traversed, and that these claims are in condition for allowance. As such, Applicant respectfully submits that the basis for rejecting Claims 4-5, 7, 9 and 11-12 under 35 U.S.C. § 103(a) is also traversed, as these claims are dependent on allowable base claims and contain additional limitations that are patentably distinguishable over the combination of Narasimhan, Nevarez, Saliba and Shaw.

Moreover, with regard to Claim 10, the instant Office Action states, with reference to Saliba, "Since the server is application specific, the virtual machine residing on the server must be application specific."

Applicant respectfully disagrees with this statement, and respectfully submits that there is no rationale supporting such a statement. The server and the virtual machine are different elements. Applicant respectfully submits that it is possible to have one element that is specific to a particular application working with another element that can be used for more than one application including the particular application. Because one of the elements is application-specific does not require that the other element be application-specific. Therefore, Applicant respectfully submits that Saliba does not show or suggest an application-specific virtual machine as recited in Claim 10, and also as recited in Claim 6. For this additional reason, Applicant respectfully submits that Claims 6 and 10, and Claims 7, 9, 11 and 12 dependent on Claims 6 and 10, are not shown or suggested by the combination of Narasimhan, Nevarez, Saliba and Shaw.

#### Claim 2

Claim 2 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Nevarez in view of Saliba and further in view of Narasimhan, Shaw and Breslau et al. ("Breslau;" US 5,761,512). The Applicant has reviewed the cited references and respectfully submits that the present invention as recited in Claim 2 is not anticipated nor rendered obvious by Nevarez, Saliba, Narasimhan, Shaw and Breslau, alone or in combination.

As presented above, Applicant respectfully submits that independent Claim 1 is not shown or suggested by the combination of Nevarez, Saliba, Narasimhan and Shaw. Claim 2 is dependent on Claim 1.

Applicant respectfully asserts that Breslau does not overcome the shortcomings of Nevarez, Saliba, Narasimhan and Shaw. Applicant respectfully submits that Breslau, alone or in combination with Nevarez, Saliba, Narasimhan and Shaw, does not show or suggest a method comprising "providing a web server class library and a virtual machine class library, wherein the web server class library and the virtual machine class library include classes for different web applications and for forming different application-specific web servers; ... and ... compiling the web server by selecting, from the web server class library and the virtual machine class library, classes required to run the web application in the device to form the web server, wherein the web server is specific to the web application" as recited in independent Claim 1.

In summary, Applicant respectfully asserts that the features of the present invention recited in independent Claim 1 is not shown or rendered obvious by Nevarez, Saliba, Narasimhan, Shaw and Breslau, alone or in combination. Therefore, Applicant respectfully submits that the Examiner's basis for rejecting Claim 2 under 35 U.S.C. § 103(a) is traversed, as Claim 2 is dependent on an allowable base claim and contains additional limitations that are patentably distinguishable over the combination of Nevarez, Saliba, Narasimhan, Shaw and Breslau.

Moreover, Applicant respectfully notes that five references are cited against Claim 2. The fact that a large number of references must be combined in an attempt to meet the claimed invention is evidence of nonobviousness.

Claims 3 and 8

Claim 3 and 8 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Narasimhan in view of Breslau and further in view of Madany et al. ("Madany;" US 6,199,196). The Applicant has reviewed the cited references and respectfully submits that the present invention as recited in Claims 3 and 8 is not anticipated nor rendered obvious by Narasimhan, Breslau and Madany, alone or in combination.

Claim 3 is dependent on independent Claim 1, and Claim 8 is dependent on independent Claim 6. With regard to Claims 1 and 6, the instant Office Action admits that Narasimhan, even when combined with other references (the Office Action names Nevarez and Saliba), does not show or suggest the present invention as recited in Claims 1 and 6.

Applicant respectfully submits that Breslau and Madany do not overcome the shortcomings of Narasimhan. Applicant respectfully asserts that Breslau, Madany and Narasimhan, alone or in combination, do not show or suggest a method comprising "providing a web server class library and a virtual machine class library, wherein the web server class library and the virtual machine class library include classes for different web applications and for forming different application-specific web servers; ... and ... compiling the web server by selecting, from the web server class library and the virtual machine class library, classes required to run the web application in the device to form the web server, wherein the web server is specific to the web application" as recited in independent Claim 1, nor do Breslau, Madany and Narasimhan, alone or in combination, show or suggest "a web server class library and a virtual machine class library, each including classes for different web applications for forming different application-specific web servers; and .. a

compiler that ... forms an application-specific web server ... and forms an application-specific virtual machine" as recited in independent Claim 6.

In summary, Applicant respectfully asserts that the features of the present invention recited in independent Claims 1 and 6 are not shown or rendered obvious by Narasimhan, Breslau and Madany (alone or in combination). Therefore, Applicant respectfully submits that the Examiner's basis for rejecting Claims 3 and 8 under 35 U.S.C. § 103(a) is traversed, as these claims are dependent on allowable base claims and contain additional limitations that are patentably distinguishable over the combination of Narasimhan, Breslau and Madany.

#### Conclusions


In light of the above remarks, Applicant respectfully requests reconsideration of the rejected Claims. Based on the arguments presented above, Applicant respectfully asserts that Claims 1-12 overcome the rejections of record and, therefore, Applicant respectfully solicits allowance of these Claims.

The Examiner is invited to contact Applicant's undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Respectfully submitted,

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